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CHRISTOPHER J. NEUMANN, ESQ.
Admitted Pro Hac Vice
GREENBERG TRAURIG, LLP
1144 15th Street, Suite 3300
Denver, Colorado 80202
Telephone: (303) 572-6500
Email: neumannc@gtlaw.com
Counsel for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

DANIELLE E. WOMACK,

Plaintiff,

v.

C. R. BARD, INCORPORATED and BARD
PERIPHERAL VASCULAR,
INCORPORATED,

Defendants.

CASE NO. 2:19-CV-01881-JCM-BNW

**ERRATA TO VERIFIED PETITION
FOR PERMISSION TO PRACTICE
IN THIS CASE ONLY BY
ATTORNEY NOT ADMITTED TO
THE BAR OF THIS COURT AND
DESIGNATION OF LOCAL
COUNSEL
(CHRISTOPHER J. NEUMANN)**

Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively “Defendants” or “Bard”) respectfully request this Court to accept this Errata to the Verified Petition for Permission to Practice in This Case Only by Attorney Not Admitted to the Bar of this Court and Designation of Local Counsel submitted by Christopher J. Neumann, of the law firm Greenberg Traurig LLP and located in Denver, Colorado, as counsel for Defendants.

Mr. Neumann filed his petition to practice *pro hac vice* (“Petition”) on November 20, 2019. [Dkt. 10.] The Court granted the Petition on November 22, 2019. [Dkt. 11.]

1 Defendants respectfully request this Court to replace the Petition originally filed with the
2 Court with the corrected *pro hac vice* petition attached to this Errata as Attachment 1. The
3 revisions to the Petition include Exhibits B and C to Attachment 1.

4 This motion is necessary to comply with Local Rule 1A 11-2.

5 DATED this 27th day of February 2020.

6 GREENBERG TRAURIG, LLP

7 By: /s/ *Eric W. Swanis*

8 ERIC W. SWANIS, ESQ.

9 Nevada Bar No. 6840

10 10845 Griffith Peak Drive, Suite 600

Las Vegas, Nevada 89135

11 CHRISTOPHER J. NEUMANN, ESQ.

12 *Admitted Pro Hac Vice*

13 GREENBERG TRAURIG, LLP

14 1144 15th Street, Suite 3300

Denver, Colorado 80202

15 Telephone: (303) 572-6500

16 *Counsel for Defendants*

CERTIFICATE OF SERVICE

I hereby certify that on **February 27, 2020**, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service.

/s/ Evelyn Escobar-Gaddi

An employee of GREENBERG TRAURIG, LLP

ATTACHMENT 1

1
2
3
4
5
6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8
9 DANIELLE E. WOMACK,
10 Plaintiff(s),
11 vs.
12 C. R. BARD, INCORPORATED and
13 BARD PERIPHERAL VASCULAR,
14 INCORPORATED,
Defendant(s).

Case #2:19-cv-01881-JCM-VCF

VERIFIED PETITION FOR
PERMISSION TO PRACTICE
IN THIS CASE ONLY BY
ATTORNEY NOT ADMITTED
TO THE BAR OF THIS COURT
AND DESIGNATION OF
LOCAL COUNSEL

FILING FEE IS \$250.00

15
16 Christopher J. Neumann, Petitioner, respectfully represents to the Court:
(name of petitioner)

17 1. That Petitioner is an attorney at law and a member of the law firm of

18 Greenberg Traurig, LLP

19 (firm name)

20 with offices at 1144 15th Street, Suite 3300,
(street address)

21 Denver

22 (city)

Colorado

(state)

80202

(zip code)

23 303-572-6500

(area code + telephone number)

neumannc@gtlaw.com

(Email address)

24 2. That Petitioner has been retained personally or as a member of the law firm by

25 C. R. Bard, Inc., Bard Peripheral Vascular, Inc. to provide legal representation in connection with
26 [client(s)]

27 the above-entitled case now pending before this Court.
28

3. That since October 30, 1998, Petitioner has been and presently is a
(date)
member in good standing of the bar of the highest Court of the State of Colorado
(state)
where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or
from the clerk of the supreme court or highest admitting court of each state, territory, or insular
possession of the United States in which the applicant has been admitted to practice law certifying
the applicant's membership therein is in good standing.

4. That Petitioner was admitted to practice before the following United States District Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts of other States on the dates indicated for each, and that Petitioner is presently a member in good standing of the bars of said Courts.

Court	Date Admitted	Bar Number
U.S. District Court for the District of Colorado	December 15, 1998	785900
U.S. District Court, District of Columbia	June 4, 2007	CO0044
U.S. Court of Appeals, Tenth Circuit	May 6, 1999	
U.S. Court of Appeals, Ninth Circuit	September 15, 2016	
U.S. Court of Appeals, Eighth Circuit	May 2002	
U.S. Court of Appeals, District of Columbia	May 2010	
State of Colorado	October 30, 1998	29831

5. That there are or have been no disciplinary proceedings instituted against petitioner, nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory or administrative body, or any resignation or termination in order to avoid disciplinary or disbarment proceedings, except as described in detail below:

None

1 6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give
2 particulars if ever denied admission):

3 No

6 7. That Petitioner is a member of good standing in the following Bar Associations.

7 American Bar Association
8 Colorado Bar Association

10 8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2
11 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

12 Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied
------------------------	-------	--	---

14 ~~XXXX~~

15 [See Exhibit B and Exhibit C attached hereto.](#)

19 (If necessary, please attach a statement of additional applications)


20 9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the
21 State of Nevada with respect to the law of this state governing the conduct of attorneys to the same
22 extent as a member of the State Bar of Nevada.

23 10. Petitioner agrees to comply with the standards of professional conduct required of
24 the members of the bar of this court.

25 11. Petitioner has disclosed in writing to the client that the applicant is not admitted to
26 practice in this jurisdiction and that the client has consented to such representation.


1 That Petitioner respectfully prays that Petitioner be admitted to practice before this Court
2 FOR THE PURPOSES OF THIS CASE ONLY.

3
4 STATE OF Colorado)
5 COUNTY OF Denver)
6



Petitioner's signature

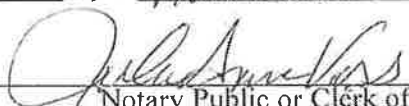
7 Christopher J. Neumann, Petitioner, being first duly sworn, deposes and says:
8 That the foregoing statements are true.



Petitioner's signature

9
10 Subscribed and sworn to before me this

11 14th day of November, 2019.

12
13 

Notary Public or Clerk of Court

JULIE ANNE VOSS
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20084003522
MY COMMISSION EXPIRES OCTOBER 3, 2020

14
15
16 **DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO**
17 **THE BAR OF THIS COURT AND CONSENT THERETO.**

18 Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner
19 believes it to be in the best interests of the client(s) to designate Eric W. Swanis,
20 (name of local counsel)
21 Attorney at Law, member of the State of Nevada and previously admitted to practice before the
22 above-entitled Court as associate resident counsel in this action. The address and email address of
23 said designated Nevada counsel is:

24 Greenberg Traurig, LLP, 10845 Griffith Peak Drive, Suite 600,
(street address)

25 Las Vegas,
(city)

Nevada,
(state)

89135,
(zip code)

26 702-792-3773,
(area code + telephone number)

swanise@gtlaw.com,
(Email address)

1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes
2 agreement and authorization for the designated resident admitted counsel to sign stipulations
3 binding on all of us.
4

5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**
6

7 The undersigned party(ies) appoint(s) Eric W. Swanis as
8 his/her/their Designated Resident Nevada Counsel in this case.
9

10 /s/ Greg A. Dadika
11 (party's signature)


12 Greg A. Dadika, Associate General Counsel, Litigation
13 (type or print party name, title)

14 _____
15 (party's signature)

16 _____
17 (type or print party name, title)

18 **CONSENT OF DESIGNEE**

19 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.
20

21 
22 Designated Resident Nevada Counsel's signature

23 _____
24 6840

25 Bar number

26 swanise@gtlaw.com

27 Email address

28 APPROVED:

Dated: February 28, 2020.

29 
30 UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on **November 20, 2019**, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service, and I hereby certify that I have mailed by United States Postal Service the document to the following non-ECF participants:

John A. Dalimonte
(MA Bar No. 554554)
DALIMONTE RUEB, LLP
85 Devonshire Street, Suite 1000
Boston, MA 02109
Telephone: (833) 443-7529
Facsimile: (855) 205-2053
john@drlawllp.com
Co-counsel for Plaintiff

/s/ Evelyn Escobar-Gaddi
An employee of GREENBERG TRAURIG, LLP

EXHIBIT A



Certificate of Good Standing and No Disciplinary History

United States District Court
District of Colorado

I, Jeffrey P. Colwell, Clerk of the United States District Court
DO HEREBY CERTIFY

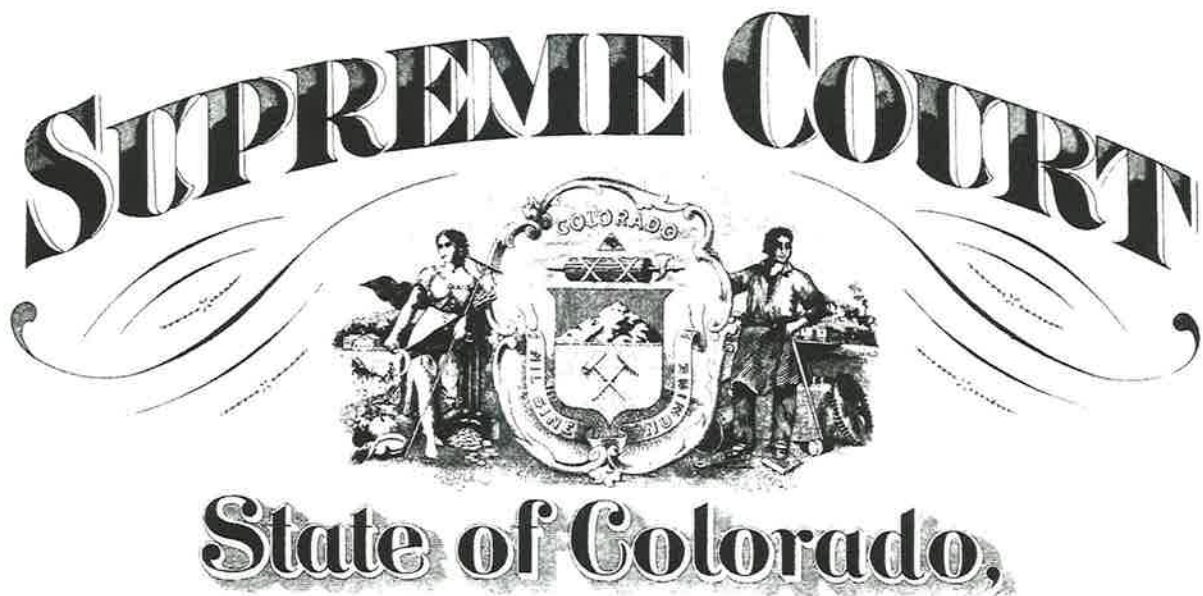
CHRISTOPHER J NEUMANN

was admitted to practice in this court on
December 15, 1998
and is in good standing with no disciplinary history.

Dated: November 12, 2019

Jeffrey P. Colwell, Clerk





STATE OF COLORADO, ss:

I, Cheryl Stevens Clerk of the Supreme Court of the State of Colorado, do hereby certify that

CHRISTOPHER JOHN NEUMANN

has been duly licensed and admitted to practice as an

ATTORNEY AND COUNSELOR AT LAW

within this State; and that his/her name appears upon the Roll of Attorneys and Counselors at Law in my office of date the 30th

day of October A. D. 1998 and that at the date hereof the said CHRISTOPHER JOHN NEUMANN

is in good standing at this Bar.



IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the Seal of said Supreme Court, at Denver, in said State, this

14th day of November A. D. 2019

Cheryl Stevens

Clerk

By

Deputy Clerk

**United States District & Bankruptcy Courts
for the District of Columbia
CLERK'S OFFICE
333 Constitution Avenue, NW
Washington, DC 20001**

I, **ANGELA D. CAESAR**, Clerk of the United States District Court
for the District of Columbia, do hereby certify that:

CHRISTOPHER NEUMANN

was, on the 4th day of June A.D. 2007 admitted to
practice as an Attorney at Law at the Bar of this Court, and is, according to
the records of this Court, a member of said Bar in good standing.

In Testimony Whereof, I hereunto subscribe my name and affix the seal of
said Court in the City of Washington this 18th day of November
A.D. 2019.



ANGELA D. CAESAR, CLERK

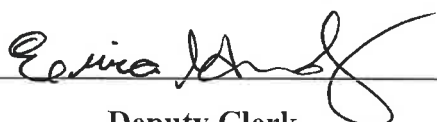
By: 
Deputy Clerk

EXHIBIT B

EXHIBIT B

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA
Christopher J. Neumann's Previously and Concurrently Filed
Petitions for Permission to Practice in This Case Only by
Attorney Not Admitted to the Bar of This Court

CASE NAME/STATUS	CASE #	DATE FILED/GRANTED [DKT. NO.]
Cardona v. C. R. Bard, Inc., et al./ Dismissed	2:19-cv-01573-KJD-BNW	Filed 10/4/19 [12]; Granted 10/7/19 [13]
Freeman v. C. R. Bard, Inc., et al.	2:19-cv-01572-RFB-BNW	Filed 10/4/19 [12]; Granted 10/9/19 [13]
Hrnciar v. C. R. Bard, Inc., et al.	2:19-cv-01872-RFB-BNW	Filed 11/20/19 [11]; Granted 11/21/19 [12]
Johnston v. C. R. Bard, Inc., et al.	3:20-cv-00069-MMD-BNW	Filed 11/20/19 [16]; Granted 11/21/19 [17]
Orgill v. C. R. Bard, Inc., et al.	2:19-cv-01882-RFB-BNW	Filed 11/20/19 [12]; Granted 11/21/19 [13]
Scholer v. C. R. Bard, Inc., et al./ Dismissed	2:19-cv-01568-KJD-BNW	Filed 10/4/19 [15]; Granted 10/16/19 [16]
Sekuler v. C. R. Bard, Inc., et al.	2:19-cv-01568-KJD-BNW	Filed 10/4/19 [13]; Granted 10/22/19 [16]
Spilotro/Duenas v. C. R. Bard, Inc.	2:19-cv-01586-KJD-BNW	Filed 10/3/19 [11]; Granted 10/7/19 [14]
Tilden v. C. R. Bard, Inc., et al./ Stipulated Dismissal to be Filed	2:19-cv-01571-JAD-DJA	Filed 10/4/19 [19]; Granted 10/7/19 [20]
Vanbiber v. C. R. Bard, Inc., et al.	2:19-cv-01884-KJD-BNW	Filed 11/20/19 [10]; Granted 11/22/19 [11]
Womack v. C.R. Bard, Inc., et al.	2:19-cv-01881-JCM-BNW	Filed: 11/20/19 [10]; Granted 1/22/19 [11]
Woods v. C. R. Bard, Inc., et al.	2:19-cv-01583-RFB-BNW	Filed 10/4/19 [13]; Granted 10/9/19 [14]

EXHIBIT C

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

DANIELLE E. WOMACK,

Plaintiff,

v.

C. R. BARD, INCORPORATED and BARD
PERIPHERAL VASCULAR,
INCORPORATED,

Defendants.

CASE NO. 2:19-cv-01881-JCM-BNW

**AFFIDAVIT IN SUPPORT OF
VERIFIED PETITION FOR
PERMISSION TO PRACTICE IN THIS
CASE ONLY BY ATTORNEY NOT
ADMITTED TO THE BAR OF THIS
COURT AND DESIGNATION OF
LOCAL COUNSEL**

STATE OF COLORADO)

)

)

ss:

)

COUNTY OF DENVER)

I, CHRISTOPHER J. NEUMANN, being first duly sworn upon my oath, depose and state as follows:

1. I file this Affidavit pursuant to Local Rule IA 11-2(h)(2). I am a shareholder with the law firm of Greenberg Traurig, LLP ("GT"). GT was retained by Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively "Defendants" or "Bard") to provide them legal representation for the many cases remanded to this District, and hundreds of others remanded in other states, from the Multi-District Litigation proceeding styled *In re: Bard IVC Filter Litigation*, No. 2:15-MD-02641-DGC, pending before Senior Judge David Campbell of the District of Arizona (the "MDL").

To date, there have been two rounds of remands from the District of Arizona MDL to the District of Nevada. In the first round of remands on August 20, 2019, fourteen (14) cases were remanded to this District. In the second round of remands on October 17, 2019, ten (10)

1 cases were remanded to this District. The above-captioned case was part of the second round
2 of remands to this District. *See Suggestion of Remand and Transfer Order (Second)* (Dkt. 3.)
3 More remands are expected in the future.

4 2. I am a member in good standing of the State Bar of Colorado, where I regularly
5 practice law. I am also admitted to practice before the United States District Courts for the
6 District of Colorado and the District of Columbia, and several U.S. Circuit Courts of Appeal.
7 *See Verified Petition, No. 4.*

8 3. I am co-lead in this action and several of the other MDL remands to this Court
9 with Eric W. Swanis, who is a member of the State Bar of Nevada and a GT shareholder who
10 resides and practices law in Nevada. *See Verified Petition (Attachment 1).*

11 4. Due to the number and timing of these remands, I inadvertently neglected to
12 identify in No. 8 of my Verified Petition the other MDL remand cases in which I had
13 previously or simultaneously filed applications to practice *pro hac vice* before this Court. I
14 have now corrected the Verified Petition to identify all actions in which I have filed
15 applications to appear as counsel under Local Rule IA 11-2(b)(7) during the past three years.
16 *See Exhibit B to Verified Petition.*

17 5. My firm has extensive experience in medical device products liability actions
18 and represents Bard in remands of IVC filter litigation across the country. I also have had
19 extensive interactions with client representatives concerning the facts underlying this matter
20 and am familiar with the facts and client-specific legal strategies pertinent to this litigation.


21 6. The granting of my Verified Petition serves the ends of justice by ensuring that
22 the interests of Bard are thoroughly represented by the persons most knowledgeable about the
23 litigation.

24 7. I therefore submit this Affidavit to establish special circumstances and good
25 cause to permit Bard to be defended in this matter by its counsel of choice. In my judgment,
26 Bard would be deprived of these benefits if I were unable to represent it in this litigation.


1 8. For all foregoing reasons, there are special circumstances and good cause that warrant
2 the granting of my Verified Petition.

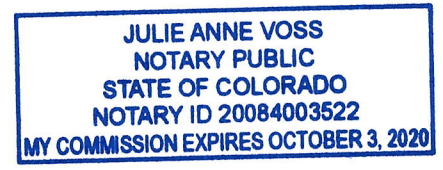
3 FURTHER YOUR AFFIANT SAYETH NAUGHT.

4
5 DATED this 26th day of February, 2020.

6
7
8 
CHRISTOPHER J. NEUMANN, ESQ.

9 SUBSCRIBED AND SWORN to before me this
10 26th day of February, 2020.

11
12 
13 Notary Public or Clerk of Court



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10845 Griffith Peak Drive
Suite 600
Las Vegas, Nevada 89135
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